

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.,

Plaintiffs,

v.

**NOTICE OF MOTION TO DISMISS**  
**FED.R.CIV.P. 12(b)(6)**

Civil Action No. 24-CV-40-EAW-MJR

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC) et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

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**MOTION ON BEHALF OF:**

Defendant Richard K. Gustafson II  
by and through his attorneys,  
CONNORS LLP.

**DATE, TIME, AND PLACE  
OF MOTION:**

To be determined by this Court, before  
the Hon. Michael J. Roemer, United  
States District Court Judge, Robert H.  
Jackson United States Courthouse, 2  
Niagara Square, Buffalo, New York  
14202.

Oral argument is requested.

**RELIEF REQUESTED:**

An Order of this Court dismissing the  
Second Amended Complaint against  
Defendant Richard K. Gustafson II,  
together with such other and further  
relief as this Court deems just and  
proper.

**GROUND FOR  
RELIEF REQUESTED:**

Fed.R.Civ.P. 12(b)(6)

**SUPPORTING PAPERS:**

Memorandum of law in Support,  
together with all prior pleadings and  
proceedings

Movant intends to submit reply papers.

DATED: Buffalo, New York  
October 14, 2024

/s/ Terrence M. Connors

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TO: All Parties of Record (via CM/ECF)